United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

3/15/04

MAR 3 2004

Mr. Greg Read
Executive Manager, Exports and Food Policy
Australian Quarantine and Inspection Service
Edmund Barton Building
GPO Box 858
Canberra ACT 2601
Australia

Dear Mr. Read:

Enclosed is the final report of the Food Safety and Inspection Service (FSIS) on-site audit of Australia's meat inspection system. This audit was conducted April 23 through June 5, 2003. Comments received from the government of Australia have been included as an attachment to the final report.

If you have any questions regarding the FSIS audit or the final audit report, please contact me at telephone number (202-720-3781), facsimile number (202-690-4040), or email address (sally.stratmoen@fsis.usda.gov).

Sincerely,

Sally Stratmoen JD

Sally Stratmoen
Director
International Equivalence Staff
Office of International Policy

Enclosure

cc:
Andrew C. Burst, Counselor, American Embassy, Canberra
Dr. Andrew Cupit, Veterinarian Counselor, Embassy of Australia, Washington, D.C.
Mike Conlon, FAS Area Director
Amy Winton, State Department
Linda Swacina, Deputy Administrator, FSIS
Karen Stuck, Assistant Administrator, OIA, FSIS
Donald Smart, Director, Review Staff, OPEER, FSIS
Sally Stratmoen, Director, IES, OIA, FSIS
Clark Danford, Director, IEPS, OIA, FSIS
Mary Stanley, Director, IID, OIA, FSIS
Steve McDermott, IES, OIA, FSIS
Country File (Australia Audit File FY 2003)

FINAL

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FINAL REPORT OF AN AUDIT CARRIED OUT IN AUSTRALIA COVERING AUSTRALIA'S MEAT AND POULTRY INSPECTION SYSTEM

APRIL 23 THROUGH JUNE 5, 2003

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

ATM	Area Technical Manager
CCA	Central Competent Authority – Australian Quarantine and Inspection Service (AQIS)
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
LM	*Listeria monocytogenes*
NOID	Notice-of-Intent-to-Delist
OPV	On-Plant Veterinarian
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
Salmonella	*Salmonella* species
SATM	Senior Area Technical Manager
SSOP	Sanitation Standard Operating Procedures

1. INTRODUCTION

The audit took place in Australia from April 23 through June 5, 2003.

An opening meeting was held on April 23, 2003 in Canberra with the Central Competent Authority (CCA). At this meeting, the team leader confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information related to travel to establishments, laboratories and hotel accommodations for the auditor that was needed to complete the audit of Australian meat inspection.

The auditor was accompanied during the entire audit by representatives from the CCA, (the Australian Quarantine and Inspection Service) and/or representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit with special emphasis on the audit of residue laboratories. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of CCA, five regional offices, six residue laboratories and one microbiology laboratory performing analytical tests on the United States-destined product; ten slaughter establishments, seven processing establishments and one cold storage facility.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional	5	
Laboratories		7	
Meat Slaughter Establishments		10	
Meat Processing Establishments		7	
Cold Storage Facilities		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved visit to five regional, interviewing officials and verification of AQIS oversight programs. The third part involved on-site visits to eighteen establishments: ten slaughter establishments, seven processing establishments and one cold storage facility. The fourth part involved visits to six AQIS contract residue laboratories that perform analysis of official residue samples by one of the auditors. Additionally, one microbiological laboratory (Blackburn, Victoria) which conducts analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and

Salmonella was audited. Names and locations of all these laboratories are provided in Section 8 and also in the attached appendix).

Program effectiveness determinations of Australia's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Australian inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Australia and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

At the opening meeting, the auditor explained that Australian meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Australia. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

Equivalence determinations are those that have been made by FSIS for Australia under provisions of Article 4.1 of the Sanitary/Phytosanitary Agreement.

Australia has adopted the FSIS regulatory requirements for HACCP. Salmonella testing is the same with exception of the following equivalent measures:

1. SAMPLE COLLECTOR: Establishments take samples.

    - Australia has a clearly written sampling plan with instructions for sample collection and processing that will be universally followed. AQIS Meat Circular 96/46, "Implementation of Bacterial Testing Requirements of the U.S. Pathogen Reduction Program," provides detailed instructions to establishments and AQIS staff on procedures for sampling and testing for *salmonella*.
    - Australia has a means of ensuring that establishments sample collection activities and laboratory performances are acceptable. Samples are taken under the oversight of government veterinarians. Laboratories that analyze samples are accredited. Test results are provided directly to AQIS by accredited laboratories.
    - Australia uses the test results to monitor establishment performance over time. AQIS has developed an electronic database that allows an assessment against

performance windows and an assessment between establishments against national average for each species category.

- Australia takes immediate action any time an establishment fails to meet a *Salmonella* performance standard. AQIS initiates an investigation any time *Salmonella* is detected and a second sample is initiated.

2. LABORATORIES: Private laboratories analyze samples.

- Private laboratories are authorized by the government. Labs are accredited by the Australia's National Association of Testing Authorities (NATA). The NATA uses ISO/IEC Guide 58, Calibration and Testing Laboratory Accreditation Systems- General Requirements for Operation and Recognition" and ISO/IEC Guide 25, " General Requirements for the Competence of Calibration and Testing Laboratories , as accreditation standards. All NATA -accredited labs must participate in an AQIS/NATA proficiency testing program operated in accordance with ISO Guide 43," Development and Operation of Laboratory Proficiency Testing Programs." NATA operates under a Memorandum of Understanding with the Australian Government. The MOU recognizes NATA as the National authority for accreditation of laboratories conducting tests and measurements. Laboratories are subject to a through review by NATA before the accreditation is granted.
- NATA requires that accredited laboratories have properly trained personnel, suitable facilities and equipment, written quality assurance program, and reporting and record keeping facilities.
- Test results are provided directly to AQIS by the accredited laboratories.

3. *SALMONELLA* TESTING STRATEGY: Year round, continues.

- Australia requires year-round continuous *Salmonella* sampling in all U.S. export establishments. In large establishments, samples are taken daily until a violation is found. If a violation is found, a "USDA" sample set is scheduled to be taken. In small establishments, samples are taken weekly until a violation is found. If a violation is found, the establishment is placed on daily sampling and a "USDA" sample set is scheduled. Australia follows FSIS' enforcement procedures in both large and small establishments.
- Australia requires year-round continuous *salmonella* sampling of all products for which there is a U.S. performance standard.
- Australia's testing program has statistical criteria for evaluating the test results.
- The percentage of *Salmonella* positives over time must meet the FSIS performance standard.

4. ENFORCEMENT STRATEGY.

- Establishments collect *Salmonella* samples continuously, year-round. Samples are collected daily in large establishments, at least weekly in small establishments.

- AQIS investigates every *Salmonella* positive test result and requires corrective action where a cause can be identified. After a single positive test result, AQIS requires the establishment to commence a second daily sampling window. Continued unsatisfactory performance, i.e., a third failure, results in more severe AQIS actions including, but not limited to, suspension of establishment operations and re-validation of its HACCP Plans.
- Australia has been given permission to slaughter equines in one facility where ratites are slaughtered, under conditions outlined in letter from FSI S.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

- The Poultry Products Inspection Action (21 U.S.C. 451 et seq.) and the Poultry Products Inspection Regulations (9 CFR Part 381).

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: www.fsis.usda.gov/OPPDE/FAR/index.htm

During the FSIS audit conduct in August 2001, 14 establishments were audited and serious deficiencies were found in two establishments, which were designated as marginal/re-review because of the non-existence of SSOP and deficient implementation of HACCP programs.

In February/March of 2002, 13 establishments were audited. Ten establishments had an incomplete HACCP program of which five did not complete the hazard analysis and five others had no pre-shipment review. Six establishments did not designate employee or location for collecting *E. coli* samples. Corrective actions taken in response to deviations were incomplete in two establishments, flow diagrams were incomplete in two establishments, and there was no CCP for zero tolerance of fecal contamination in one establishment.

6. MAIN FINDINGS

6.1 Government Oversight

With the exception noted below, all inspection veterinarians and inspectors in establishments certified by Australia to export meat products to the U.S. are full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

- A practitioner veterinarian on contract with AQIS to provide official inspection duties in an establishment on King Island, Victoria is also on contract with cattle owners of the island to provide veterinarian services to cattle sold to the same establishment.

6.1.1 CCA Control Systems

FSIS regulations require that foreign countries seeking eligible to export meat to the United States or to maintain their current eligibility be organized and administered by the national government. More specifically, there must be sufficient organizational structure and staffing to ensure uniform enforcement of the requisite laws and regulations in all establishments producing product for export to the United States. Second, the national government must have ultimate control and supervision over the official activities of all employees and licensees. Third, the national government must ensure the assignment of competent, qualified inspectors. Fourth, national inspection officials must have the authority and responsibility to enforce the laws and regulations governing meat inspection. Finally, the country must have adequate administrative and technical support to operate its inspection program.

Australia's meat program is headed by a Manager for Food Services Group and is divided in to three sections; a) Regional Business Managers/ Assistant Regional Managers Export; b) Manager Meat Program and; c) Manager Verification Unit. Two Senior Area Technical Managers and five Regional Area Technical Managers (ATMs), located at Queensland, New South Wales, South Australia, Western Australia and Victoria/Tasmania, report to the Manager Meat. Each ATM is responsible for in-plant activities of on-plant veterinary officers (Inspectors-in-charge), senior meat inspectors and meat inspectors. Monthly supervisory visits are provided by one of the ATMs. Plant level instructions are supervised by either Senior Meat Inspector or by the On-Plant Veterinarian. Verification Units consisting of four members perform audits of establishments based on the performance over a period of time that is determined through a system based on the establishment's history. Reports are generated and sent directly to the Manager Food Services Group.

6.1.2 Ultimate Control and Supervision

Manager Food Service Group in AQIS has the legal authority to supervise the activities of the, SATMs, ATMs and in-plant inspection personnel. AQIS Export Food Inspection Operations Group disseminates information through SATMs and ATMs to the On-plant veterinarian (OPV). OPVs are responsible for ensuring that establishment officials comply with all legislative and FSIS requirements. Roles and relationships between SATMs and ATMs, however, are not clearly defined.

6.1.3 Assignment of Competent, Qualified Inspectors

Full-time, permanent CCA veterinarians possessing a Veterinary Science degree or equivalent from accepted tertiary educational institutions who are eligible for registration in Australian State/Territory are considered qualified to apply for the inspection service. After being hired, they work as a trainee for 3-6 months. Each trainee undergoes one week of induction training in public service and AQIS orientation. Professional development programs are provided to experienced staff.

Private practitioners, called Contract Veterinarians, are hired on a part-time basis. These contractors may own a Veterinary Clinic but many are former (retired) AQIS employees. After being hired, contract veterinarians are required to spend time with various OPVs to make them familiar with AQIS requirements, on an as needed basis. The contract contains a clause requiring disclosure of conflicts of interest. However, what constitutes a conflict-of-interest is not fully defined. In that regard, see Section 6.1 above concerning a conflict of interest.

Full-time, permanent CCA meat inspectors perform inspection duties under the supervision of a veterinarian. Meat Inspectors must have a certificate III of competency in meat inspection or higher qualification from a recognized educational institution. After being hired, meat inspectors undergo on-the-job training with a senior inspector on the line before being allowed to perform independent duties.

6.1.4 Authority and Responsibility to Enforce the Laws

AQIS has the authority and responsibility to enforce the applicable laws relevant to U.S. certified establishments. AQIS not only has the authority to approve establishments for export to the United States, but also has the responsibility for withdrawing such approval when establishments do not have adequate and/or effective controls in place to prevent, detect, and eliminate product contamination/adulteration. Establishments intending to export to the United States send requests for registration to the ATM, which has the responsibility to inspect the establishment and perform a pre-approval audit. Once a satisfactory audit is achieved, the ATM grants approval for U.S. listing on behalf of the Secretary of Commonwealth of Australia and communicates his approval to the AQIS Export Food Inspection Operation Group and Export Documentation Manager (EXDOC) located at the AQIS headquarters. The establishment is then listed for export to the U.S.

AQIS' National Plant Management System (NPMS) is responsible for monitoring, verification, and reporting. It also records and tracks establishment deficiencies and timely corrective actions. NPMS is also used for collecting, recording and storing information on all operational activities of establishments, including monitoring of corrective actions and verification processes. The newly formed Verification Unit performs "systems audits" of establishments based on their performance over a period of time that is determined through the system based on the establishments' history.

6.1.5 Adequate Administrative and Technical Support

The CCA has adequate administrative personnel and technical resources to support appropriate third party audits and to follow up on reports prepared by the verification unit and other internally prepared reports.

6.2 Headquarters Audit

The auditor conducted interviews at Headquarters and at the Regional Offices with the AQIS officials relating to government oversight activities supervised from these levels. No concerns arose as a result of these interviews.

6.3.1 Audit of Regional and Local Inspection Sites

During visits to the following Regional Offices, interviews were conducted with SATM, ATM and Business Managers at these offices: Brisbane, Melbourne, Adelaide, Perth and Sydney.

Discussion focused on the roles played by the SATM and ATMs, OPV and inspectors in carrying out oversight of the U.S.-certified plants, recruiting, training and the documentation of controls. No major concerns arose as result of these discussions except that the relationship between the two SATMs and the ATMs is not well defined. It was not clear if the SATM was the immediate supervisor of the ATMs or if the ATMs were reporting directly to AQIS headquarters.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 18 establishments. Ten were slaughter establishments, seven processing establishments and one was a cold storage facility. One establishment that was selected for review was replaced due to being delisted by AQIS one week prior to audit for potential commingling of U.S.-designated product with product from non-U.S. approved establishments. One establishment received an NOID. This establishment may retain its certification for export to the United States provided all deficiencies noted by the auditor during his review are corrected within 30 days of the date the establishment was reviewed and the corrections were verified by AQIS.

Specific deficiencies are noted in the attached individual establishment review forms .

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are being used to analyze meat products destined for the United States.

An in-depth review of six residue laboratories was done by an FSIS chemist. This review focused on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

A review of one microbiology laboratory focused on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test U.S. samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The Silliker Microtech Laboratory in Blackburn, Victoria was reviewed. The following deficiencies were noted:

- Check samples were verifying the proficiency of the system and not the laboratory analysts.

- One laboratory did not have sequentially numbered working standards book.
- Four laboratories did not have corresponding names and signatures on file.
- One laboratory had a discrepancy in the written method and method being used for performing analysis which may or may not impact the results.
- Microbiology laboratory was assigning internal laboratory numbers at receipt of sample but original forms were being given to analyst, thereby defeating the purpose of concealing identity of samples for the analyst.

The auditor also visited a farm to verify proper control, storage and application of prescribed drugs for the treatment of animals. All drugs were properly secured and used. The owner and veterinarian each maintained a log of all drugs administered at the farm. The government veterinarian verifies proper drug use on a regular basis.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess Australia's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, as noted below, Australia's inspection system did not seem to have full controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

Australia's inspection system did have controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic inspection program. The SSOP in the 18 establishments were found to meet the *basic* FSIS regulatory requirements, with no deficiencies. However, the following deficiencies were noted in the SSOP implementation.

Six establishments had deficiencies in implementation of SSOP.

- Five establishments had deviations in implementation of SSOP
- One establishment was not evaluating the effectiveness of SSOP

9.2 Sanitation

Five establishments had deficiencies relating to general sanitation.

- Two establishments had deficiencies in grounds and pest control.

- Two establishments had deficiencies relating to water supply.
- In two establishments, the water temperature in sterilizers was below 82°C.
- One establishment had deficiencies in the area of construction and maintenance.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Australia's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviews is Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *E. coli* testing program in slaughter establishments.

11.1 Humane Handling and Slaughter

No deficiencies were noted.

11.2 HACCP Implementation

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the seventeen slaughter/processing establishments. Sixteen establishments had adequately implemented basic HACCP requirements. Six establishments had deficiencies in HACCP implementation.

The following deficiencies were noted in this area:

- Four establishments had deviations in HACCP implementation requirements.

- Four establishments had deficiencies in verification and validation of HACCP plans and pre-shipment reviews.
- Two establishments had deviations in the monitoring of HACCP plans.

11.3 Testing for Generic *E. coli*

Australia has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Ten of the 17 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in all certified slaughter establishments. No concerns arose as result of the audit.

11.4 Testing for *Listeria monocytogenes*

In accordance with U.S. requirements, the applicable certified establishments were required to reassess their HACCP plans to include *Listeria monocytogenes* as a hazard reasonably likely to occur had done so. No problems were noted in this area.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

The names of the laboratories have been noted previously in Section 8. The following deficiencies were noted:

- FSIS laboratory testing methods were not being used for antibiotics, sulfonamides, ractopamines, flunixin, CHC, COP and clenbuterol.
- AQIS needs to improve its control of contract laboratories to assure that they are using FSIS methods.
- Details of other concerns have been already noted in Section 8 above.

Australia's National Residue Testing Plan for 2003 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*. The following deficiencies were noted:

- Problems were noted with inspection controls in 10 establishments relating to enforcement of FSIS' HACCP, SSOP, and performance standards.

- In one establishment, condemned product was not being denatured properly.
- In one establishment, there was a conflict of interest situation with the veterinarian-in-charge.
- At the cold storage facility, one loaded truck ready to leave the premises appeared to be unsecured. There was potential for a food security problem.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Australia has adopted the FSIS requirements for testing for *Salmonella* with the exception of the equivalent measure(s) noted previously in Section 3.

Ten of the 17 establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in 10 of the 17 establishments.

13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

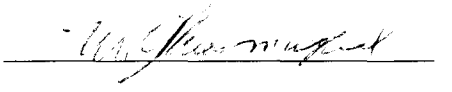
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on June 5, 2003 in Canberra with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. M. Ghias Mughal
Chief, International Audit Staff



15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Laboratory Audit Forms
Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE: 4-28-2003

NAME OF FOREIGN LABORATORY: Animal Research Inst.

FOREIGN GOV'T AGENCY: Australia

CITY & COUNTRY:

ADDRESS OF LABORATORY: Y-eerongbilly

NAME OF REVIEWER: Rita Kishore

NAME OF FOREIGN OFFICIAL:

Residue Code/Name ▶

	REVIEW ITEMS	ITEM #	EVALUATION CODE
SAMPLING PROCEDURES	Sample Handling	01	A
	Sampling Frequency	02	A
	Timely Analyses	03	A
	Compositing Procedure	04	O
	Interpret Comp Data	05	O
	Data Reporting	06	A
ANALYTICAL PROCEDURES	Acceptable Method	07	U
	Correct Tissue(s)	08	A
	Equipment Operation	09	A
	Instrument Printouts	10	A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A
	Recovery Frequency	12	A
	Percent Recovery	13	A
	Check Sample Frequency	14	A
	All analyst w/Check Samples	15	U
	Corrective Actions	16	
	International Check Samples	17	
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE
OTHER REVIEW		19	EVAL. CODE
		20	EVAL. CODE

SIGNATURE OF REVIEWER

DATE: 4/29/03

FSIS FORM 9530-4 (9/96)

Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	4-28-2003	Animal Research Inst.

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia		Y-eerongbilly

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

RESIDUE	ITEM NO.	COMMENTS
	7	FSIS method not used.
	15	Check of system rather than analyst. The QC manager also responsible for running methods.
	19	The signatures were missing on repeat sample sheets since March 2003.
	20	The plate ID numbers and control numbers were not enetered in old books dating 2002. The numbers were entered in the later books.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
4-29-2003	Chemical Residue Labs

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia		

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

	REVIEW ITEMS	ITEM #	EVALUATION CODE	Residue Code/Name ▶												
SAMPLING PROCEDURES	Sample Handling	01		A												
	Sampling Frequency	02		A												
	Timely Analyses	03		A												
	Compositing Procedure	04		O												
	Interpret Comp Data	05		O												
	Data Reporting	06		A												
ANALYTICAL PROCEDURES	Acceptable Method	07		U												
	Correct Tissue(s)	08		A												
	Equipment Operation	09		A												
	Instrument Printouts	10		A												
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11		A												
	Recovery Frequency	12		A												
	Percent Recovery	13		U												
	Check Sample Frequency	14		U												
	All analyst w/Check Samples	15		A												
	Corrective Actions	16		A												
	International Check Samples	17														
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE													
OTHER REVIEW		19	EVAL. CODE													
		20	EVAL. CODE													

SIGNATURE OF REVIEWER

for Rita Kishore / Nicholas Wright

DATE

2/07/04

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	4-29-2003	Chemical Residue Labs

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia		

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

RESIDUE	ITEM NO.	COMMENTS
	7	Not FSIS method.
	13	The recovery for tetracycline and oxgletracycline was low but the violation check sample was chlortetracycline so the results were reported.
	15	Check samples are a check of the system.
	19	The penicillin standard died before the expiration date. The lab was investigating.
	20	The file with corresponding names and signatures was not available.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
5-1-2003	Amdel Limited

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Asquilth	5 Kelray Place

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

Residue Code/Name ▶

	REVIEW ITEMS	ITEM #	EVALUATION CODE															
SAMPLING PROCEDURES	Sample Handling	01		A														
	Sampling Frequency	02		A														
	Timely Analyses	03		A														
	Compositing Procedure	04		O														
	Interpret Comp Data	05		O														
	Data Reporting	06		A														
ANALYTICAL PROCEDURES	Acceptable Method	07		O														
	Correct Tissue(s)	08		A														
	Equipment Operation	09		A														
	Instrument Printouts	10		A														
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11		A														
	Recovery Frequency	12		A														
	Percent Recovery	13		A														
	Check Sample Frequency	14		A														
	All analyst w/Check Samples	15		U														
	Corrective Actions	16																
	International Check Samples	17																
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE															
OTHER REVIEW		19	EVAL. CODE															
		20	EVAL. CODE															

SIGNATURE OF REVIEWER	DATE
Rita Kishore / on behalf of	2/5/03

FSIS FORM 9530-4 (9/96)

Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	5-1-2003	Amdel Limited

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Asquilth	5 Kelray Place

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

RESIDUE	ITEM NO.	COMMENTS
	15	The check sample is a check of the system not the analyst.
	19	Check samples made by the analyst that does HPLC- conflict of interest.
	20	Name and signature corresponding file not available (present), not kept.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
5-2-2003 and 5-5-2003	AGAL - Sydney Lab

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Pymble	1 Saukin Road

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

	REVIEW ITEMS	ITEM #	EVALUATION CODE	Residue Code/Name ▶												
SAMPLING PROCEDURES	Sample Handling	01		A												
	Sampling Frequency	02		A												
	Timely Analyses	03		A												
	Compositing Procedure	04		O												
	Interpret Comp Data	05		O												
	Data Reporting	06		A												
ANALYTICAL PROCEDURES	Acceptable Method	07		U												
	Correct Tissue(s)	08		U												
	Equipment Operation	09		A												
	Instrument Printouts	10		A												
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11		U												
	Recovery Frequency	12		A												
	Percent Recovery	13		A												
	Check Sample Frequency	14		A												
	All analyst w/Check Samples	15		U												
	Corrective Actions	16														
	International Check Samples	17														
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE													
OTHER REVIEW		19	EVAL. CODE													
		20	EVAL. CODE													

SIGNATURE OF REVIEWER: for Rita Kishore

DATE: 2/8/...

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	5-2-2003 and 5-5-2003	AGAL - Sydney Lab

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Pymble	1 Saukin Road

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

RESIDUE	ITEM NO.	COMMENTS
	7	FSIS method used for pesticides but not for B-agonists and MSAID's. Also, same method (Henion's) is used for DES.
	8	Urine is used for tactopamine, not liver as used by FSIS.
	11	a. Since urine is analyzed for tactopamine, I am not sure if the limit of detection corresponds to the tolerance in liver. Australia should provide the data. (U.S. tolerance in hogs - liver 0.15 ppm and 0.05 ppm in meat.) b. For flunixin methdo, there is no approved hydrolysis step. Australia should provide the ratio of percent bound to the percent unbound flunixin to ensure that the percent unbound meets U.S. tolerance requirements. (0.125 ppm cattle liver and 0.025 meat.)
	15	The check sample is a check of the system, not the analyst.
	19	The cheat sheet (summary sheet) for B-agonists method did not match the written method.
	20	The working standard book was not sequentially numbered.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
5-7-2003	AGAL - Perth

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Pymble	3 Clive Road Cotteslos WA 6011

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

	REVIEW ITEMS	ITEM #	EVALUATION CODE	Residue Code/Name ▶												
SAMPLING PROCEDURES	Sample Handling	01	A													
	Sampling Frequency	02	A													
	Timely Analyses	03	A													
	Compositing Procedure	04	O													
	Interpret Comp Data	05	O													
	Data Reporting	06	A													
ANALYTICAL PROCEDURES	Acceptable Method	07	A													
	Correct Tissue(s)	08	A													
	Equipment Operation	09	A													
	Instrument Printouts	10	A													
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A													
	Recovery Frequency	12	A													
	Percent Recovery	13	A													
	Check Sample Frequency	14	A													
	All analyst w/Check Samples	15	A													
	Corrective Actions	16														
	International Check Samples	17														
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE													
OTHER REVIEW		19	EVAL. CODE													
		20														

SIGNATURE OF REVIEWER

DATE 2/25/04

FSIS FORM 9530-4 (9/90)

Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	5-7-2003	AGAL - Perth

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Pymble	3 Clive Road Cotteslos WA 6011

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

RESIDUE	ITEM NO.	COMMENTS
	19	Logbook with signatures and corresponding names is not maintained.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
5-7-2003	AGAL - Perth

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Pymble	3 Clive Road Cotteslos WA 6011

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

	REVIEW ITEMS	ITEM #	EVALUATION CODE	Residue Code/Name ▶												
SAMPLING PROCEDURES	Sample Handling	01		A												
	Sampling Frequency	02		A												
	Timely Analyses	03		A												
	Compositing Procedure	04		O												
	Interpret Comp Data	05		O												
	Data Reporting	06		A												
ANALYTICAL PROCEDURES	Acceptable Method	07		A												
	Correct Tissue(s)	08		A												
	Equipment Operation	09		A												
	Instrument Printouts	10		A												
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11		A												
	Recovery Frequency	12		A												
	Percent Recovery	13		A												
	Check Sample Frequency	14		A												
	All analyst w/Check Samples	15		A												
	Corrective Actions	16														
	International Check Samples	17														
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE													
OTHER REVIEW		19	EVAL. CODE													
		20														

SIGNATURE OF REVIEWER Rita Kishore

DATE 2/27/04

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	5-7-2003	AGAL - Perth

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Australia	Pymble	3 Clive Road Cotteslos WA 6011

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Rita Kishore	

RESIDUE	ITEM NO.	COMMENTS
	19	Logbook with signatures and corresponding names is not maintained.

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
HJ Heinz Company Australia Ltd. Wagga Wagga New South Wales	May 2, 2003	39	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment:

Est. No. 39

Date of Audit: May 2, 2003

38. One of the entry doors had gaps around the door frame and a moth was observed flying inside the processing room. Inspection officials took immediate action to kill the moth and temporary and permanent corrective measure to close the door were ordered.

51. AQIS Inspectors did not understand all of the FSIS Sanitation requirements.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Naturally Australian Food PTY Ltd Hemmant, Queensland	May 26, 2003	106	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

18. Monitoring records of CCP 1 (Temperature) by the establishment official did not show actual temperature readings. They showed only check marks.

51. No records of verification by the AQIS officials were available.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
R. M. Ghias Mughal	M. Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Patrick Logistics Ltd. Morningside, Queensland	May 1, 2003	117	Australia
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. M. Ghias Mughal	[X] ON-SITE AUDIT	[ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	O
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O
16. Records documenting implementation and monitoring of the HACCP plan.	o
17. The HACCP plan is signed and dated by the responsible establishment individual.	o
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	o
19. Verification and validation of HACCP plan.	o
20. Corrective action written in HACCP plan.	o
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	o
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	o
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	o
28. Sample Collection/Analysis	o
29. Records	o
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	o
31. Reassessment	o
32. Written Assurance	o

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	o
34. Species Testing	o
35. Residue	o
Part E - Other Requirements	
36. Export	
37. Import	o
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	o
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	o
53. Animal Identification	o
54. Ante Mortem Inspection	o
55. Post Mortem Inspection	o
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	o
57. Monthly Review	
58.	
59.	X

60. Observation of the Establishment

Est. 117 -cold store

Date of Audit: May 1, 2003

59. One truck loaded with boxed product and ready for transporting product to ship yard did not appear to be properly secured.

61. NAME OF AUDITOR

Dr M Ghias Mugal

62. AUDITOR SIGNATURE AND DATE

Dr Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Glengor Pastoral Co. Pty Ltd. West Gosford New South Wales	May 30, 2003	Est. 299	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
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Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 299

date of Audit: May 30, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal 6/10/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Tatiara Meat Company Laverton North Victoria	May 20, 2003	Est. 389	Australia
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. M. Ghias Mughal	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
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12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
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Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
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Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 389

Date of Audit: May 20, 2006

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal 6/15/06

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Everett & Steele Pty Ltd. (Perth Meat Exporters) Osborne Park Western Australia	May 9, 2003	505A	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	O
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. No. 505A Date of Audit: May 9, 2006

10. Residues of meat and fat from the previous day's operation were observed in cryovac machine, inside of the meat grinder and stainless meat tubs which were ready for use.

51. AQIS Inspectors did not understand all of the FSIS SSOP requirements.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
DR. M. Ghias Mughal	M. Ghias Mughal 6/15/13

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
T and R Murray Bridge Lagoon Road Murray Bridge South Australia	May 15, 2003	Est. 533	Australia
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. M. Ghias Mughal	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 533 Date of Audit: May 15, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Okakey Abattoir Pty. Ltd. Jondaryan Road P. O. Box 156 Oakey, Queensland	April 30, 2003	Est.558	Australia
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. M. Ghias Mughal	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 558 Date of Audit: April 30 15, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Western Australian Meat Marketing cooperative Limited Katanning, Western Australia	May 8, 2003	572	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	O
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. No. 572 Date of Audit: May 8, 2003

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Ghias Mughal	M. Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Longford Meat Company King Island, Victoria	May 12, 2003	Est. 790	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. No. 790 Date of Audit: May 12, 2003

10. SSOP did not specify the equipment and procedures for cleaning of the equipment during pre-operartional sanitation.

Some plant monitoring records indicated repeat deficiencies but no permanent corrective actions had been documented.

39. Boning room was too congested. Sterilizes and hand washing facilities for workers assigned to the inside boning lines were Not easily accessible. It is very difficult for these workers to move out of their stations and go to the facilities located on one side of the room.

51. Official AQIS contract veterinarian is the only veterinarian on the island. He also provides veterinary services to all cattle owners on the island. This is a conflict of interest situation since animals treated or otherwise serviced by him are later slaughtered at this establishment and passed for export.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M Ghias Mughal 611573

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Midfield Meat International Pty. Ltd. Kidman Park Adelaide	May 14, 2003	Est. 1058	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical contro points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	O
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. No. 1058 Date of Audit: May 14, 2003

20. Corrective actions were not clearly defined in the HACCP Plan. Action taken as result of deviations did not mention of any preventive actions taken .

51. AQIS Inspectors did not understand all of the FSIS HACCP requirements.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Ghias Mughal	M Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
G& K O' Connor Pakenham Abbatoir Pakenham, Victoria	May 19, 2003	Est. 1065	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	X
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 1265 Date of Audit: May 19, 2006

19 Pre-shipment review form did not list all the CCPs although all records appeared to have been checked prior to release of each lot.

51. AQIS Inspectors did not understand all of the FSIS HACCP requirements.

54. Fresh water facility was not provided in the suspect pen

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Ghias Mughal	M. Ghias Mughal 6/15/06

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
The Game Meat Company of Australia Pty Ltd. Eurobin, Victoria	May 21, 2003	Est. 2019	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		X ON-SITE AUDIT ☐ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	X
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	X
59.	

60. Observation of the Establishment

Est. 2019

Date of Audit: May 21, 2003

15. HACCP Plan was incompletely developed . It did not have adequate monitoring procedures and frequencies. Verification element was completely missing. Plan was not even being implemented as written.

38. Bulk carton store room had cob web, dust on the box material, and had gaps in the door and wall allowing dust and vermin entry.

46. Several sterilizers in use, at the time of the visit were below 82degree C. Slaughter operation was suspended by AQIS until required temperature was achieved.

48. Inedible/condemned product was not being denatured, as required.

51. AQIS Inspectors did not understand all of the FSIS SSOP and HACCP requirements.

58. Since plant is not on the FSIS list at the moment, it will not be on the list until all deficiencies are corrected.

61. NAME OF AUDITOR

DR. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal 6/15/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO	4. NAME OF COUNTRY
	April 28, 2003	Est. 2291	Australia
Teys Brothers Dodds Road Innisfail, Queensland	5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal	6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 2291 Date of Audit: April 28, 2003

10. Frequency of operational sanitation and person responsible for maintenance of operational sanitation was not specified in In the sanitation program.

51. AQIS Inspectors did not understand all of the FSIS SSOP requirements.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Ghias Mughal	Dr. Ghias Mughal 5/11/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Ozimeats Pty Ltd Pyramid Hills Victoria	May 23, 2003	Est. 2346	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	X
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	X
59.	

60. Observation of the Establishment

Est. 2346

Date of Audit: May 23, 2003

10. Meat and fat residue from previous day's operation were observed on the lazy Susan, band saw and one product belt; all ready for use.

18. Monitoring of temperature at the CCP was not being done per HACCP Plan. Plan called for continuous monitoring of temperatures. However, Continuous Temperature Recording Device was not functional. Temperatures were being recorded during the day at convenience of the staff.

19. Verification of HACCP plan was inadequate.

43. Water pressure through out the plant was very low and water chlorination equipment was not properly functioning.

46. One sterilizers in use, at the time of the visit was below 82degree C. Slaughter operation was suspended by AQIS until required temperature was achieved.

51. AQIS Inspectors did not understand all of the FSIS SSOP and HACCP requirements.

58. Plant was issued an NOID notice by AQIS officials.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
DR. M. Ghias Mughal	M. Ghias Mughal 6/05/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Meramist Pty, Ltd. Old Gympie Road Caboolture, Queensland	April 29, 2003	Est. 3416	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Ghias Mughal		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	O
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	O
37. Import	O
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	X

60. Observation of the Establishment:

Est. 3416 Date of Audit: April 29 15, 2003

10. No operational sanitation verification frequency was specified in the sanitation program.
19. HACCP program did not have verification as a part of the program.

51. AQIS Inspectors did not understand all of the FSIS SSOP and HACCP requirements.

59. This plant was not on the FSIS approved list at time of the visit but is interested to be on the FSIS list after October when Australia is expected to be allowed ratite's export under FSIS requirements. It slaughters equines two days per week . No Other species is slaughtered on these days and AQIS has a written procedure and safeguards in place to keep meats from different species segregated during deboning and packaging.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Ghias Mughal	M. Ghias Mughal 6/10/03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Waltell pty. Ltd. Bastings Street, Northcote Victoria	May 20, 2003	Est. 5642	Australia
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. M. Ghias Mughal	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	O
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est. 5642 Date of Audit: May 20, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal 6/15/03

Facsimile Message

To: Sally Stratmoen
Company: FSIS
Phone: (202) 720-3781
Fax: (202) 690-4040

From: ANDREW CUPIT, Veterinary Counsellor
Company: Embassy of Australia, Washington DC
Phone: (202) 797-3319
Fax: (202) 797-3037
e-mail: Andrew.Cupit @dfat.gov.au

Date: 11 February 2004
Pages incl. cover: 9
File No:

SUBJECT: Australia: Response to Review Report.

Dear Sally,

Please find attached the reply from AQIS on the FSIS audit report of Australian meat inspection systems.

Regards, Andrew.

Australian Government
Australian Quarantine and Inspection Service

Our Ref: 03/8936, 03/8786
I:\FOODPOL\INTMEA\PUBLIC\MS2004_92\FinalLetterFSISReview03.doc

11 February 2004

Ms Sally Stratmoen
Director
International Equivalence Staff
Office of International Affairs
United States Department of Agriculture
Food Safety and Inspection Service
WASHINGTON D C 20250

Dear Ms Stratmoen

Thank you for your letter dated 1 December 2003 detailing the outcome of the FSIS audit of Australia's meat inspection system from 23 April through 5 June 2003.

I acknowledge that some of the issues raised in your letter regarding Sanitation Standard Operating Procedures (SSOP) and Hazard Analysis and Critical Control Point (HACCP) systems have been raised in previous reviews. AQIS will continue to develop and implement programs to address these concerns to ensure Australian product conforms to FSIS requirements. I can assure you that these issues will continue to taken seriously and a remedial strategy has been developed to address the shortcomings identified. The key components of the strategy include:

- The development of a comprehensive training program for on-plant veterinarians, which covers, inter alia, all facets of SSOP and HACCP systems. I expect implementation of this training program to commence in March 2004. In addition AQIS has been consulting with industry to ensure that there is a parallel and equivalent training process for establishment personnel, hence facilitating improvement on a whole of industry basis.

- Increased mentoring of Area Technical Managers and more extensive utilisation of performance management to improve national consistency in the management of all operational systems, including SSOP and HACCP systems. The current role of the Senior Area Technical Managers is being revised as part of the strategy to increase mentoring and improve consistency.

- Enhancement of the Verification Unit. The Verification Unit was initially established in 2001. The role and activity levels of the Unit are currently being reviewed with a view to significantly strengthening its role as an auditing body independent from the Meat Inspection Program.

In relation to the specific issues raised in your letter, I would like to make the following remarks.

- Residue Laboratory Audits

  The draft final report raises some general and specific issues in relation to the residue laboratories visited as part of the audit. On the general issue of the use by laboratories of analytical methods not approved by FSIS, this is addressed separately in the request from AQIS for an equivalence review by FSIS of Australia's system for the procurement of laboratory services sent in a submission provided to FSIS by the Australian Embassy in Washington DC on

5 February 2004. On the matters identified specific to each laboratory visited, separate individual responses are provided in the table at Attachment 1.

- Microbiology Laboratory Audit

  Laboratories testing samples for the ESAM program operate and abide by the principles of Good Laboratory Practices and are accredited to the relevant International Standard, ISO/IEC 17025. The accreditation of laboratories for compliance to this standard in Australia is undertaken by the National Association of Testing Authorities - Australia (NATA). NATA is an independent internationally recognised body that accredits laboratories in various disciplines in Australia and abroad. As the issue raised by the FSIS auditor relates to the laboratory procedure, it will be taken up with NATA.

- Notice of Intent to Delist Establishment 2346.

  I note your acknowledgement of our letter of 9 July 2003 certifying that Establishment 2346 had corrected all deficiencies and the corrective actions were verified by AQIS officials.

- Establishment 790

  AQIS is mindful of FSIS's view that the situation at Establishment 790 is a direct conflict of interest. Although we are not aware of any instances of professional misconduct relating to the perceived conflict of interest (or for any other reason), AQIS agrees that the contract veterinary officer used at Establishment 790 should relinquish production animal practice activities to remove the apparent conflict of interest. Should this not be possible then another veterinary officer will be appointed.

  Additionally AQIS is reviewing its current standard contract for veterinary officers to more clearly define what constitutes conflict of interest for contract staff. This should be available in March 2004.

An action plan which addresses all issues raised in the audit report attached to your letter is at Attachment 2.

In conclusion, I would like to once again thank you for the opportunity of responding to your audit report. AQIS takes the FSIS audit findings extremely seriously and is confident that the actions outlined in this letter and the attached action plan will deliver significant improvements to our program and ensure Australian product exported to the United States continues to meet FSIS requirements.

Yours sincerely

Greg Read
Executive Manager
Exports

ATTACHMENT 1

USDA FSIS Audit of NRS Contract Laboratories
May – June 2003

Australian Response to Laboratory Specific Issues Raised in Final Draft FSIS Report Dated 3 October 20032003 (see also Note 1)

FSIS Reviewer: Rita Kishore

Laboratory audited	Issue raised in Final FSIS Report		NRS Response
	Item No.	FSIS Comment	
ARI-Yeerongpilly	7	FSIS method not used	this is addressed as a general issue in the NRS Equivalence Submission on laboratory services
	15	check of system rather than analyst QC manager also responsible for running method	the laboratory has implemented arrangements to ensure that training records of staff involved in the analysis of check samples are updated to reflect their involvement and performance as evidence of ongoing capability and competence new arrangements implemented to ensure that a separate second QC manager has oversight when first QC manager is involved in the analytical process
	19	the signatures were missing on repeat sample sheets since March 2003	procedures being revised to ensure that signatures are present on repeat samples
	20	the plate ID numbers and control numbers were not entered in old books dating 2002. The numbers were entered in the later books.	Resolved, space for such details now included in all work books
CRL - Lismore	7	FSIS method not used	this is addressed as a general issue in the NRS Equivalence Submission on laboratory services
	13	the recovery for tetracycline and oxytetracycline was low but the violation check sample was chlortetracycline so the results were reported	the laboratory is no longer an NRS contract laboratory for antimicrobials in the random monitoring program
	15	check of system rather than analyst	the laboratory has implemented arrangements to ensure that training records of staff involved in the analysis of check samples are updated to reflect their involvement and performance as evidence of ongoing capability and competence
	19	the penicillin standard died before the expiration date.	solvent for standard solution changed to one in which b-lactams are more stable - acetonitrile:ethanol:water (25:25:50), Ref. 1

	-	- the file with corresponding names and signatures was not available	- maintaining a list of staff signatures and initials is not a specific NATA requirement but may be implemented by laboratories at their own discretion. While most laboratories have limited staff in the relevant section and everyone can recognise the signatures and/or initials, a list of names, signatures and initials of all staff involved in NRS programmes has been prepared and will be appropriately maintained
AMDEL - Asquith	- 15	- check of system rather than analyst	- the laboratory has implemented arrangements to ensure that training records of staff involved in the analysis of check samples are updated to reflect their involvement and performance as evidence of ongoing capability and competence
	- 19	- check samples prepared by analyst that does HPLC – conflict of interest	- arrangements implemented to ensure that preparation of check samples is totally independent of analytical process
	- 20	- name and signature corresponding file not available (present), not kept	- maintaining a list of staff signatures and initials is not a specific NATA requirement but may be implemented by laboratories at their own discretion. While most laboratories have limited staff in the relevant section and everyone can recognise the signatures and/or initials, a list of names, signatures and initials of all staff involved in NRS programmes has been prepared and will be appropriately maintained
AGAL - Sydney	- 7	- FSIS method used for pesticides but not for b-agonists and NSAIDS. Also, same method (Henion's) is used for DES	- this is addressed as a general issue in the NRS Equivalence Submission on laboratory services
	- 8	- urine is used for ractopamine, not liver as used by FSIS	- ractopamine is a target analyte in a multi-residue urine screen for beta-agonist (clenbuterol, cimaterol and salbutamol) to monitor for illegal use. See also note 2 below for a more detailed discussion on this issue.

	- 11	- a) since urine is analysed for ractopamine, I am not sure if the limit of detection corresponds to the tolerance in liver. Australia should provide the data. (U.S. tolerance in hogs – liver 0.15 ppm and 0.05 ppm in meat.) - b) For flunixin method, there is no approved hydrolysis step. Australia should provide the ratio of percent bound to the percent unbound flunixin to ensure that the percent unbound meets U.S. tolerance requirements. (0.125 ppm cattle liver and 0.025 meat)	- see response to Point 8 above - flunixin is part of a multi-residue liver screen for NSAIDs with a method LOD of 0.001 mg/kg for parent flunixin in liver. See also note 3 below for a more detailed discussion on this issue
	- 15	- the check sample is a check on system, not the analyst	- the laboratory has implemented arrangements to ensure that training records of staff involved in the analysis of check samples are updated to reflect their involvement and performance as evidence of ongoing capability and competence
	- 19	- the cheat (summary) sheet for b-agonists method did not match the written method	- resolved, method update and summary sheet now incorporated in method to ensure that only one controlled copy is available
	- 20	- the working standard book was not sequentially numbered	- resolved, all working standard preparations are now recorded in sequentially numbered log book
AGAL - Perth	- 19	- log book of signatures and corresponding names is not maintained	- maintaining a list of staff signatures and initials is not a specific NATA requirement but may be implemented by laboratories at their own discretion. While most laboratories have limited staff in the relevant section and everyone can recognise the signatures and/or initials, a list of names, signatures and initials of all staff involved in NRS programmes has been prepared and will be appropriately maintained
SCL - Melbourne	- 7	- FSIS method not used	- this issue will be addressed in the NRS Equivalence Submission on laboratory services
	- 15	- the check sample is a check on system, not the analyst	- the laboratory has implemented arrangements to ensure that training records of staff involved in the analysis of check samples are updated to reflect their involvement and performance as evidence of ongoing capability and competence
	- 19	- discrepancy between written method and the method being performed. Will not affect the result.	- Resolved - all methods updated

	- 20	- name and signature corresponding file is not maintained	- maintaining a list of staff signatures and initials is not a specific NATA requirement but may be implemented by laboratories at their own discretion. While most laboratories have limited staff in the relevant section and everyone can recognise the signatures and/or initials, a list of names, signatures and initials of all staff involved in NRS programmes has been prepared and will be appropriately maintained

References:

1 Solvent degradation of cloxacillin *in vitro*. Tentative identification of degradation products using thermospray liquid chromatography-mass spectrometry. Tyczkowska *et al.*, J. of Chromatography, 594 (1992), 195 – 201.

Note 1: all laboratories were able to demonstrate that they had a quality system in place, had quality manuals, standard operating procedures, methods manuals, were accredited to ISO 17025, had the appropriately qualified and experienced staff in place, had training programmes, had monthly intralaboratory check sample program in place, had corrective action protocols and participated in continuing external (NRS) PT.

Note 2: The Audit report for AGAL Sydney raised the use of urine as the matrix to analyse for residues of the beta-agonist, ractopamine. NRS currently uses a multi-residue screen in urine to monitor for illegal use of beta-agonists in food producing animals. Ractopamine currently has no registered use in any food animal species in Australia. The decision to add ractopamine to the beta agonist screen in urine is consistent with the purpose of the screen to monitor for the illegal use of the beta-agonists where any detection is significant. In the absence of any legal use for ractopamine in Australia, quantification of residues in an edible matrix is hard to justify when a regulatory standard (MRL) has yet to be set. Once ractopamine is registered in Australia and an MRL is set by Food Standards Australia and New Zealand (FSANZ), consideration will be given to changing the target matrix for ractopamine to liver for the appropriate species.

Note 3: The Audit report for AGAL Sydney raised the absence of an acid hydrolysis step in the extraction procedure used in the analysis of flunixin residues in liver. While the analytical method used at the laboratory does not include an hydrolysis step as identified in the audit report, the detection limit of the method (LOD) is 0.001 mg/kg for flunixin per se. This LOD is low enough to be able to detect the presence of the free compound at well below the US tolerance of 0.125 mg/kg (liver) and the Australian MRL of 0.02 mg/kg (liver). For a violation of the US standard of 0.125 mg/kg to be missed by the Australian laboratory, the ratio of free to acid hydrolysable flunixin would need to be in the order of 1 in 125 (0.001/0.125). Since 1 July 2002 a total of 1139 beef, sheep, pig, horse, deer and ratite liver samples have been assayed for free flunixin in NRS residue monitoring programs, without a single detection. The absence of any detection in this number of samples provides reassuring evidence to support the view that flunixin misuse is not a problem in Australian livestock production at the present time. Consideration is being given to the appropriateness of the extraction procedure in the Australian method for screening for NSAIDs in liver.

ATTACHMENT 2

FSIS Report Heading	AQIS Action	Timeframe
Government Oversight	The contract veterinary officer used at Establishment 790 on King Island will either cease production animal practice activities or will be replaced with another Veterinary Officer	February 2004
	The current contracts for veterinarians is being revised to more clearly define what constitutes conflict of interest for contract staff	March 2004
	As previously mentioned the SATM roles are currently under review to ensure the positions provide an effective mentoring role and contribute to the national consistency in the Meat Program	February 2004
Sanitation and Controls	Most of the issues of concern in both the SSOP's and General Sanitation were constricted to a small number of establishments. To address this inconsistency AQIS will re-assess the US Essential Requirements, which are available to each export-registered establishment, via the Internet, to ensure these requirements clearly identify FSIS approach and requirements.	The re-assessment and update will be conducted during March 2004 and available to staff on plant in April 2004.
	In addition, it is intended to conduct re-fresher training for ATMs in auditing skills so there is a more consistent approach to the assessment of SSOP's and general sanitation requirements on the establishment.	June/July 2004
Slaughter/Processing Controls	The analysis indicates that there is variability in the implementation process, which is consistent with the Verification Unit findings. Re-assessment of the US Essential Requirements will occur as mentioned above and the focus of HACCP planning will be clearly outlined in this document.	The re-assessment and update will be conducted during March

	In addition, there will be re-fresher training for ATMs in the development of the HACCP plan and how to effectively challenge the logic of its development.	2004 and available to staff on plant in April 2004. Due to the specialized nature of this training it is aimed to have this training available in July 2004 and completed by the end of August 2004.
Enforcement Controls	The most significant finding of the enforcement control is the issue that AQIS Inspectors did not understand all of the FSIS sanitation and HACCP requirements. These are being addressed through the program changes mentioned above. In addition to these changes AQIS has undertaken a longer-term strategy that relates to implementation of a training program for On-Plant Veterinarians integrating a performance management program feeding into learning agreements. The learning agreements are centrally assessed to ensure that training needs are identified and are provided, where needed, on a national basis.	To commence this strategy AQIS will be training ATMs in the procedure of workplace assessing during February and March 2004, and will commence the process of assessing all on-plant veterinary officers in June 2004. This will take a period of approximately fourteen months.
Regarding the other two enforcement issues identified in the draft report 1. Condemned material not being denature properly, and 2. At the cold storage facility, one loaded truck ready to leave the premises appeared to be un-secured	AQIS will address the issues through a security assessment and strategy development process currently being undertaken. If necessary update the US essential requirements to identify suitable denaturants in addition to those specified in the EMOs.	It is intended that the security strategy will commence implementation in early 2004 and continue ensuring regular monthly assessments of part of the security requirements at random as determined by AQIS.